

EXHIBIT 4

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO**

MELODY JOY CANTU AND DR. RODRIGO
CANTU,

5:20-CV-0746 JKP – HJB

Plaintiffs,

v.

DR. SANDRA GUERRA and DIGITAL
FORENSICS CORPORATION, LLC,

Defendants.

Plaintiffs' Designation of Expert Witness

Plaintiffs Dr. Rodrigo Cantu and Melody Joy Cantu, through their undersigned attorneys, hereby submit the following expert witness designation pursuant to the Court's Fifth Amended Scheduling Order (Dkt. No. 59), and The Rules of Civil Procedure Rule 26(a)(2)(A).

1. Jeff Fischbach
Forensic Technologist
SecondWave, Inc.
9909 Topanga Canyon Boulevard, #205
Chatsworth, California 91311
(818) 773-0400 x34

Mr. Fischbach will testify regarding the matters and opinions contained in his expert report. Mr. Fischbach's report containing the information required by The Rules of Civil Procedure Rule 26(a)(2)(B) was provided to the opposing parties. Mr. Fischbach is retained to provide expert testimony and may be contacted through undersigned counsel.

Discovery in this matter is ongoing, and Plaintiffs reserve the right to amend and supplement this designation if it is determined that additional expert testimony is required, and further specifically reserves the right to call additional, supplemental, and rebuttal experts in accordance with Rule 26 of the Federal Rules of Civil Procedure.

The above-listed expert witness has agreed to testify at trial and will be sufficiently familiar with the pending action.

Dated: September 15, 2021

Stipulated and respectfully submitted,

/s/ Tor Ekeland

Tor Ekeland (NY Bar No. 4493631)
Pro Hac Vice
Tor Ekeland Law, PLLC
30 Wall Street, 8th Floor
New York, NY
t: (718) 737 - 7264
f: (718) 504 - 5417
tor@torekeland.com

and

/s/ Rain Levy Minns

Rain Minns
State Bar No. 24034581
Minns Law Firm, P.C.
d/b/a Rain Minns Law Firm
4412 Spicewood Springs Rd., Suite 500
Austin, Texas 78759-8583
Tel.: 512-372-3222
Fax: 512-861-2403
rain@rainminnslaw.com

*Counsel for Plaintiffs Melody Joy Cantu and
Dr. Rodrigo Cantu*

Certificate of Service

I certify that on this 15th of September 2021, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/ Tor Ekeland



Tor Ekeland
Managing Partner
(718) 737-7264
tor@torekeland.com

Via Email:

For Defendant Digital Forensics Corporation:

Jerry Rios, Esq.
Law Office of Jerry Rios
13809 Research Blvd. Suite 500
Austin, TX 78750
(512) 501-6270
Email: jrios@therioslawfirm.com

For Defendant Dr. Sandra Guerra:

Ricardo G. Cedillo, Esq.
Brandy C. Peery, Esq.

Davis, Cedillo & Mendoza, Inc.
755 E. Mulberry Ave. Suite 500
San Antonio, Texas 78212
(210) 822-6666
rcedillo@lawdcm.com
bpeery@lawdcm.com

Re: *Cantu et al. v. Guerra et al.* 5:20-cv-00746-JKP-HJB (WDTX) - Expert Disclosure

Counsel:

Plaintiffs Dr. Rodrigo Cantu and Melody Joy Cantu, through their undersigned attorneys, submit the following expert witness designation report under the Court's Fifth Amended Scheduling Order (Dkt. No. 59) and Federal Rule of Civil Procedure 26(a)(2)(B).

Jeff Fischbach
Forensic Technologist
SecondWave, Inc.
9909 Topanga Canyon Boulevard, #205
Chatsworth, California 91311
(818) 773-0400 x34



Mr. Fischbach will testify regarding the matters and opinions contained in his expert report. Mr. Fischbach is retained to provide expert testimony and may be contacted through undersigned counsel.

Mr. Fischbach's testimony will be based on his review of the discovery and evidence, in this case, the results of any computer forensic investigations and his experience as a Board Recognized Forensic Examiner specializing in information communication, stored data, and electronic location technologies. Mr. Fischbach is an expert in this field for twenty-seven years and has consulted on and testified in municipal, Federal and military court, both domestic and abroad, in dozens of cases involving digitally recorded evidence. Mr. Fischbach routinely lectures and provides training in his area of expertise to civilian attorneys, law enforcement, and judges throughout North America. (See below for Mr. Fischbach's resume and access to his publications).

At this early stage, we anticipate Mr. Fischbach will testify to the following (we will update disclosures accordingly):

- The text message phishing of Mrs. Cantu by the Defendants, as well as the Phase 1 Evaluation Report from Digital Forensics Corporation, LLC (DFC);
- Defendant Dr. Sandra Guerra's counterclaims regarding Dr. Guerra's alleged hack by Mrs. Cantu, specifically IP address functionality, accuracy, and the validity of Defendants computer forensic claims, evidentiary or otherwise. This will be based on the discovery shared between the parties, including Defendant DFC's Phase 1 Report;
- The cable splitter discovered on the Plaintiffs' cable line that was both put on their property and later removed without Plaintiffs' or their cable service provider's knowledge. This determination will be made on the basis of the photos Plaintiffs have gathered from the time the cable splitter was put on their cable box, and Mr. Fischbach will discuss what the purposes of a cable splitter and how a hacker can access Plaintiff's home internet network with this type of splitter, and the implications of this type of security breach;
- The Defendants hacking of Plaintiffs and the technical means used. This determination will be made on the basis of the evidence in discovery, including the Phase 1 Forensics Report from DFC; any evidence arising from computer forensic investigations; and the disruptions to Plaintiffs' computer network as result.



Mr. Fischbach will provide us with a list of the cases he was involved with as an expert witness in the past four years, and we will forward it to you in the coming week.

Mr. Fischbach is on retainer with Tor Ekeland Law and will bill at an hourly rate in regard to this matter for the purposes of study and testimony.

Testimony \$450.00 per hour (8 hour min.*)

Deposition \$450.00 per hour (4 hour min.*)

Forensic Examination/Declaration/Affidavit/Report \$450.00 per hour (1 hour minimum plus notary fees)

Discovery in this matter is ongoing, and Plaintiffs reserve the right to amend and supplement this designation if it is determined that additional expert testimony is required as discovery and investigation continues, and further specifically reserves the right to call additional, supplemental, and rebuttal experts in accordance with Rule 26 of the Federal Rules of Civil Procedure.

The above-listed expert witness has agreed to testify at trial and will be sufficiently familiar with the pending action.

Jeff Fischbach

/s/Jeff Fischbach

Tor Ekeland

/s/ Tor Ekeland

Jeff Michael Fischbach

Forensic Technologist

SecondWave, Inc.

www.SecondWave.com ■ **818-773-0400 x34** ■ Jeff@SecondWave.com

9909 Topanga Canyon Boulevard, #205, Chatsworth, California 91311

Abstract

Jeff Michael Fischbach is founder and President of SecondWave, Inc., a technology consulting firm specializing in information systems and technology integration. Since 1994, he has served as a technology adviser to numerous professional organizations and corporations. Mr. Fischbach has been engaged as a litigation consultant and Forensic Examiner, offering expert advice and oversight on matters involving computers, information systems, satellite cellular and other communications technologies. He has advised law enforcement, foreign government representatives, judges, lawyers and the press. In addition to his work at SecondWave, Mr. Fischbach has served on several professional boards in advisory positions.

Professional Experience

- More than 20 years of hands-on professional technology experience.
- Expert-level knowledge of Windows, Mac OS, Unix and Linux, Android, OSX & Symbian operating systems.
- Proficient and equipped to conduct Encase and FTK analysis and verified on-site forensic cloning.
- Multi-state court-qualified computer, Internet, cellular and satellite expert.
- A proven commitment to community welfare through pro-bono engagements and charitable service.
- Frequent adviser and contributor to trade press.
- Frequent lecturer and public speaker across the United States.
- United States Armed Forces Contractor Status Recipient.
- United States Department of Justice National Security Clearance Recipient.
- Cited by United States Supreme Court & major media.

Employment

SecondWave, Inc. (DBA, SecondWave Information Systems)

1994-Present

Chatsworth, CA

- Litigation consulting services include fraud evaluation, forensic electronic-evidence analysis and expert testimony
- Business services include objective Internet and office technology advice, cost-analysis, ROI, as well as oversight and review of network and Internet architecture and contractors.
- Technology consulting and guidance to public and private corporation. Legal, accounting and investment firms, startups, nonprofits, government agencies and law enforcement.

Prime Time Video

1986-1993

Woodland Hills, CA

- Clientele included Pacific Bell, Los Angeles Unified School District and Delson Financial, Inc.
- Multimedia development, duplication and distribution.
- Interactive media installations for conferences, presentations, and seminars

Board Positions

Viper Capital Advisors	2000-2001	
One Sansome St., Suite 2000, San Francisco, CA 94104	Edward Ehee	415-951-4794
Board of advisors: Charged with the duty of assessing the viability of nascent technologies on behalf of myriad investors.		
Pulse Industries, Inc.	2000-Present	
400 S. Victory Bl. Suite 306, Burbank, CA 91502	Douglas Walker	818-238-0358
Board of advisors: Technology advisor to the president and board of directors on issues including market trends, competitive analysis, design and materials.		

Past & Present Memberships/Affiliations

Association for Information and Image Management Evidentiary Support Committee	AIIM.org
1100 Wayne Avenue, Suite 1100, Silver Spring, MD 20910	301-587-8202
Working closely with the United States Department of Justice, the C22 Evidentiary Support Group of AIIM concentrates on law and information technology (IT) in relation to enterprise information management, with particular focus on information as evidence. The Evidentiary Support Group is responsible for projects related to the legal acceptance of records and documents produced by information technology systems, or related to information management and information technology as they affect the evidentiary nature of information holdings.	
American College of Forensic Examiners	ACFEi.com
2750 East Sunshine, Springfield, MO 65804	417-881-3818
The American College of Forensic Examiners International (ACFEI) is an independent, scientific and professional society. Multi-disciplinary in its scope, the society actively promotes the dissemination of forensic information. The association's purpose is the continued advancement of forensic examination and consultation across the many professional fields of its membership.	
Association of Certified Fraud Examiners	CFEnet.com
716 West Avenue, Austin, TX 78701-2727	800-245-3321
The Association of Certified Fraud Examiners, established in 1988, is based in Austin, Texas. The 28,000- member professional organization is dedicated to educating in fighting fraud. Each member of the ACFE designated a Certified Fraud Examiner (CFE) has earned certification after a rigorous qualification process.	
Better Business Bureau	BBBSouthland.org
315 North La Cadena Drive, Colton, CA 92324	909-825-7280
SecondWave Information Systems is a dedicated member of the Better Business Bureau, and proudly maintains a clear BBB Reliability Report, free of customer complaints.	
Chatsworth/Porter Ranch Chamber of Commerce	ChatsworthChamber.com
10038 Old Depot Plaza Road, Chatsworth, CA 91311	818-341-2428
SecondWave Information Systems is an active member of the Chamber of Commerce in good standing, and an active participant in activities dedicated to benefiting and enhancing the community.	

California Attorneys for Criminal Justice

CACJ.org

1225 Eighth Street, Suite 150, Sacramento, CA 95814

916-448-8868

CACJ is the country's largest statewide organization of professionals dedicated to defending the rights of persons, and preserving due process and equal protection of the law, as guaranteed United States and California laws.

Electronic Frontier Foundation

EFF.org

454 Shotwell Street, San Francisco, CA 94110

415-436-9333

EFF is a donor-supported membership organization working to protect fundamental rights, regardless of technology; to educate the press, policymakers and the general public about civil liberties issues related to technology; and to act as a defender of those liberties.

Institute of Electrical and Electronic Engineers

IEEE.org

3 Park Avenue, 17TH Floor, New York, New York, 10016-5997

212-419-7900

The IEEE promotes the engineering process of creating, developing, integrating, sharing, and applying knowledge about electro and information technologies and sciences for the benefit of humanity and the profession.

Information Systems Security Association

ISSA.org

7044 S. 13th Street, Oak Creek, WI 53154

414-768-8000

The Information Systems Security Association (ISSA)® is a not-for-profit, international organization of information security professionals and practitioners. It provides educational forums, publications and peer interaction opportunities that enhance the knowledge, skill and professional growth of its members. The primary goal of the ISSA is to promote management practices that will ensure the confidentiality, integrity and availability of information resources.

National Association of Criminal Defense Lawyers

NACDL.org

1150 18TH St. NW, Suite 950, Washington, DC 20036

202-872-8600

A professional bar association founded in 1958, the NACDL is the preeminent organization in the United States dedicated to ensuring justice and due process for persons accused of crime or other misconduct. Members include attorneys, U.S. Military counsel, law professors, and judges committed to preserving fairness within America's criminal justice system.

National Legal Aid Defender Association

NLADA.org

1140 Connecticut Ave. NW, Suite 900, Washington, DC 20036

202-452-0620

The NLADA serves the community by providing legal aid and defender programs to low-income clients and their families and communities, and presenting a leading national voice in public policy and legislative debates on the many issues affecting the equal justice community.

Notable Training & Seminars

WSOPD: The Capabilities and Limitations of GPS Systems	October 21, 2016
<i>South Seattle College - Georgetown Campus, WA</i>	
WACDL: Sex, Lies & Cyberspace	September 15, 2016
<i>Olympia Resort and Conference Center, Oconomowoc, WI</i>	
OJD: Oregon Circuit Judge's Association Conference (Keynote)	April 10-11, 2016
<i>Sunriver Resort, Sunriver, OR</i>	
<i>Oregon Judicial Department - Office of Education, Training & Outreach</i>	
KCPD: 2013 Forensics Roundup -- Social Networking & Wireless Location	March 29, 2013
<i>Chinook Building, 401 Fifth Avenue, Seattle, WA</i>	
CCPD: Cell Tower Technology	September 4, 2012
<i>McDonalds Campus, Oak Brook, IL</i>	
WACDL: Annual Conference (Keynote)	June 8-9, 2012
<i>Campbell's Resort, Chelan, WA</i>	
CACJ/CPDA: Capital Case Defense Seminar	February 19, 2012
<i>Portola Inn & Conference Center, Monterey, CA</i>	
WACDL: The Digital Dragnet	February 19, 2010
<i>Red Lion Conference Center, Bellevue, WA</i>	
OCDLA: Technology and the Law	May 2-3, 2008
<i>Hallmark Resort, Newport, OR</i>	
IPDA: Fall Seminar	November 17, 2007
<i>Hilton Conference Center, Springfield, IL</i>	
Eastern District Conference	October 27, 2007
<i>Tenaya Lodge, Yosemite, CA</i>	
FPD: Sex Offense Seminar	October 19, 2007
<i>Sacramento, CA</i>	
OSAD/CJCC Death Penalty Program	September 13-14, 2007
<i>DePaul University College of Law</i>	
OJD: Judicial Conference	October 16, 2007
<i>Salishan Resort in Gleneden Beach, OR</i>	
<i>Oregon Judicial Department - Office of Education, Training & Outreach</i>	

Notable Citations & Quotations

WaPo: How a federal spy case turned into a child pornography prosecution	Apr 5, 2016
<i>Washington Post</i> Ellen Nakashima	http://wapo.st/1qoseGq
“Jeff Fischbach, a forensic technologist for the defense, said there is no evidence that the child pornography was ever seen by anyone who used the computer, much less Gartenlaub.”	
SUN: How a spy probe wound up as a child pornography prosecution	April 5, 2016
<i>Toronto Sun</i>	http://torontosun.com/2016/04/05/how-a-spy-probe-wound-up...
“Jeff Fischbach, a forensic examiner who reviewed the evidence for the defence, said the images were intermingled in extensive folders with files representing other computer users, raising the possibility someone else was responsible for the pornography.”	
NPR: When A Dark Web Volunteer Gets Raided By The Police	April 4, 2016
<i>National Public Radio</i> Martin Kaste	https://n.pr/1SwJ10c
“What happens when law enforcement is frustrated by encryption that's run by private citizens? In one Tor volunteer's case, they showed up with a warrant and asked for computer passwords.”	
NPR: FBI-Apple Showdown Is The Latest Battle In A Bigger War	February 18, 2016
<i>National Public Radio</i> Martin Kaste	https://n.pr/1Wur0mF
“The question of whether tech companies should be required to build backdoors has been floating around Congress for years. A public fight over the San Bernardino terrorism case could break the logjam.”	
Guilty Minds (Fiction)	2016
<i>Joseph Finder, Author</i>	
Acknowledgements: “...for much help on cell phones and computer forensics...” (p.385)	
The Fixer (Fiction)	2015
<i>Joseph Finder, Author</i>	
Acknowledgements (p.376)	
WaPo: Experts Say Law Enforcement's Use of Cellphone Records Can be Inaccurate	June 27, 2014
<i>Washington Post</i> Tom Jackman	http://wapo.st/1rl9KLK
“The data is often used to place suspects near crime scenes, but experts say there are limitations.”	
SUN: U.S. responds to China's cyber attacks	Feb 20, 2013
<i>Toronto Sun</i>	http://torontosun.com/2013/02/20/china-says-us-hacking-accusations-lack-technical-proof
“The war China has been winning, thus far, has been economic and it comes as no surprise to me if they're fighting dirty,” said Jeff Fischbach	
SUN: The Ugly Path	Jun 12, 2012
<i>Toronto Sun</i>	http://torontosun.com/videos/5790925001/the-ugly-path/1667762843001/page/7
“Forensic technologist Jeff Fischbach discusses the ugly on the tech trail left by Luka Magnotta.”	

SUN: Tracking Wanted Criminals

June 5, 2012

Toronto Sun

<http://www.torontosun.com/videos/1673526840001>

"Forensic technologist Jeff Fischbach joins to discuss the strategy and technology police use to track a wanted criminal."

SUN: Magnotta May Have Penned How to Disappear Blog

May 31, 2012

Toronto Sun

<http://torontosun.com/2012/05/31/magnotta-may-have-penned-how-to-disappear-blog>

"He craves attention. He's not the type to drop off the map. There are thousands of pictures of him online. It will be nearly impossible for him to hide unless he pulls a Ted Kaczynski, and lives off grid in the woods," Jeff Fischbach, a forensic technologist, told QMI from his office in California.

NPR: Computer Security Companies Debate Flame's Origins

May 30, 2012

National Public Radio

<https://n.pr/LECH4E>

Martin Kaste

"A new cyber-spying program called Flame has been spreading across the Middle East. A Russian security company called Kaspersky Labs discovered the virus. Some experts believe Flame was developed by the makers of the virus Stuxnet."

SCOTUS: United States vs. Jones

Jan 23, 2012

United States Supreme Court

Justice Samuel Alito

"See, e.g., NPR, The End of Privacy <http://www.npr.org/series/114250076/the-end-of-privacy>"

NPR: Child Pornography Bill Makes Privacy Experts Skittish

August 24, 2011

National Public Radio

<https://n.pr/ooUTBm>

Martin Kaste

"In late July, the House Judiciary Committee approved legislation that requires all Internet service providers to save their customers' IP addresses for a year. The stated purpose is to help police find child pornographers, but privacy experts say the bill is wider-reaching — and that worries them."

NPR: Your iPhone May Be Logging Your Physical Positions

April 21, 2011

National Public Radio

<https://n.pr/gviPvJ>

Martin Kaste

"Jeff Fischbach, a forensic technologist in California, says attitudes toward Apple might be very different right now if, instead of hiding the tracking file, the company had advertised it."

Buried Secrets (Fiction: Book/Movie)

2011

Joseph Finder, Author

Acknowledgements: "Jeff Fischbach, amazing forensic technologist and real-life character out of The Matrix who knows a scary amount about electronic evidence and cell-phone tracking;" (p.387)

NPR: A Click Away: Preventing Online Child Porn Viewing

August 31, 2010

National Public Radio

<http://www.npr.org/templates/story/story.php?storyId=129526579>

Martin Kaste

"Prosecution for child pornography has nearly tripled since 2000, but the Justice Department is still looking for a way to handle what it calls the "explosion" in trafficking. Companies are developing technology to better filter the images online, but the effectiveness of the private initiatives and how they will affect government enforcement remains to be seen."

TPM: Police Tapped Sprint Customer GPS Data 8 Million Times In A Year

December 4, 2009

Talking Points Memo

<http://talkingpointsmemo.com/>

Justin Elliott

“...Jeff Fischbach, a California-based forensic technologist who has been a technical consultant on many criminal cases over the years, tells TPM he's seen empirical evidence that the privacy settings are essentially meaningless.”

NPR: Digital Bread Crumbs: Following Your Cell Phone Trail

October 28, 2009

National Public Radio

<http://www.npr.org/templates/story/story.php?storyId=114241860>

Martin Kaste

“If you use a mobile phone, you're leaving a record of where you've been. But where does your phone say you are? If it relies on cell phone towers for that information, your location may be vague. GPS-enabled phones are more specific. The difference between the two can be miles wide.

DISCOVERY: Forensics, You Decide: Blood In The Birdcage

September 14, 2009

Discovery Chanel

Season 1, Episode 7

“After David Stagg reports finding the dead body of his partner Bill Jennings, he claims his Bill committed suicide. As investigation begins, it becomes clear that the scene is homicide. Is the professor the murderer, or was he framed. There are two sides to every story. Forensic scientists from both sides will give viewers the chance to make their own conclusions.”

LA Times: Firsthand prison experience

September 25, 2008

Los Angeles Times

<http://articles.latimes.com/2008/sep/25>

DeeDee Correll & Christian Berthelsen

“Sentencing expert spent several years behind bars. Now he's accused of pretending to be a lawyer.”

NYT: When the Trill of a Cellphone Brings the Clang of Prison Doors

July 16, 2007

New York Times

<https://nyti.ms/2xYf6eF>

Anemona Hartocollis

“The important thing about cell tower data is not what it proves, but what it can't prove,”

Publications

- **Caught Up In His Own Web**

Sun News Ontario June 2, 2012

Forensic technologist, Jeff Fischbach provides his analysis of Magnotta's online trail, and explains how it could help catch him.

<http://video.chathamthisweek.com/video/tech/tech/89784542001/caught-up-in-his-own-web/1669414907001/>

- **Magnotta may have penned how to disappear blog**

Sun News Network Canada May 21, 2012

Alleged dismemberment killer Luka Rocco Magnotta seemingly wrote a blog that offers step-by-step advice on how to disappear, including getting fake ID, selling assets for cash and jumping on a bus.

<http://www.torontosun.com/2012/05/31/magnotta-may-have-penned-how-to-disappear-blog>

- **Child Pornography Bill Makes Privacy Experts Skittish**

National Public Radio (NPR) August 24, 2011

- Late last month, while Washington, D.C., was focused on the debt ceiling, the House Judiciary Committee approved legislation that could have long-term consequences on Internet privacy.

The bill requires all Internet service providers to save their customers' IP addresses — or online identity numbers — for a year. The bill's stated purpose is to help police find child pornographers, but critics say that's just an excuse for another step toward Big Brother.

<http://www.wbur.org/npr/139875599/child-pornography-bill-makes-privacy-experts-skittish>

- **A Click Away: Preventing Online Child Porn Viewing**

National Public Radio (NPR) August 31, 2010

Technology to filter photos in Web searches may help the Justice Department curb online trafficking in child pornography. The department has thus far focused its efforts on prosecution, not prevention.

<http://www.npr.org/templates/story/story.php?storyId=129526579>

- **Police Tapped Sprint Customer GPS Data 8 Million Times In A Year**

TPM December 4, 2009

Under a new system set up by Sprint, law enforcement agencies have gotten GPS data from the company about its wireless customers 8 million times in about a year, raising a host of questions about consumer privacy, transparency, and oversight of how police obtain location data.

http://tpmmuckraker.talkingpointsmemo.com/2009/12/revelation_8_million_gps_searches_on_sprint_by_law.php

- **Digital Bread Crumbs: Following Your Cell Phone Trail**

National Public Radio October 28, 2009

Fischbach is a forensic technologist. Lawyers eagerly pay for his ability to extract evidence from everyday devices — he's even checked alibis on kitchen appliances. But when it comes to tracking where people go, he says, the most common source of data is in your pocket.

<http://www.npr.org/templates/story/story.php?storyId=114241860>

Other authors

- **Forensics: You Decide - "Blood in the Birdcage"**

Investigation Discovery / Discovery Channel September 14, 2009

When music professor, David Stagg, discovers the dead body of his long-time partner, Bill Jennings, he claims he's walked into the aftermath of a tragic suicide. But evidence proves it was a homicide. Did the professor commit this vicious crime, or was he falsely accused? The forensic experts on each side battle it out.

<http://www.youtube.com/watch?v=unoks0B45HY>

- **Police blotter: Child porn blamed on computer virus**

CNET News November 3, 2006

Michael Aaron O'Keefe once was an eighth-grade math teacher at Lee County High School in Albany, Ga. In addition to his day job, O'Keefe created Web sites with names like "modelquest" and "hctweens," entreating visitors to submit "hard-core images" through e-mail.

http://news.cnet.com/Police-blotter-Child-porn-blamed-on-computer-virus/2100-1030_3-6130218.html